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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

STACY SHANNON SHAW,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-01432-AC

STIPULATION TO VOLUNTARY REMAND
PURSUANT TO SENTENCE FOUR OF 42
U.S.C. § 405(g) AND TO ENTRY OF
JUDGMENT; [~~PROPOSED~~] ORDER

IT IS STIPULATED by and between Plaintiff (“Plaintiff”) and Defendant Frank Bisignano, Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, that the above-entitled action shall be remanded to the Commissioner of Social Security for further administrative proceedings.

Upon remand, the Appeals Council will remand the case to a new Administrative Law Judge (ALJ) to take further action, as warranted, to complete the administrative record and issue a new decision. The parties further request that the Court direct the Clerk of the Court to enter a

1 final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the
2 Commissioner.

3 This stipulation constitutes a remand under the fourth sentence of Section 205(g) of the
4 Social Security Act, 42 U.S.C. 405(g).
5

6 Dated: December 1, 2025

/s/ Jesse S. Kaplan *

JESSE S. KAPLAN

Attorney for Plaintiff

*Authorized via e-mail on November 21, 2025

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12 Dated: December 1, 2025

By: /s/ Zachary Berkoff-Cane

ZACHARY BERKOFF-CANE

Special Assistant United States Attorney

Attorneys for Defendant

18 **[PROPOSED] ORDER**

19 Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of
20 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown,
21 **IT IS ORDERED** that the above-captioned action is remanded to the Commissioner of Social
22 Security for further proceedings pursuant to the fourth sentence of Section 205(g) of the Social
23 Security Act, 42 U.S.C. 405(g).
24

25 DATED: December 1, 2025



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE